



April 24, 2024

Via CM/RRR# 70223330000179561371,
Regular Mail & email:davea@dewebworks.com

Dave Arnold
D.E. Web Works, LLC
3901 N. Main
Victoria, TX 77901

Re: Case No. 23-51742-cag, *In re: Cinch Wireline Services, LLC*; In the United States Bankruptcy Court Western District of Texas, San Antonio Division;

Adversary 24-05011-cag; *John Patrick Lowe, Chapter 7 Trustee for Cinch Wireline Services, LLC v. Cinch Energy Services, LLC, et al.*; In the United States Bankruptcy Court Western District of Texas, San Antonio Division

Dear Mr. Arnold,

Please be advised that Butch Boyd Law Firm and Jordan & Ortiz, P.C. have been retained to represent the interests of John Patrick Lowe, Chapter 7 Trustee for Cinch Wireline Services, LLC. Please direct all correspondence related to this matter to this law firm.

Litigation Hold

My client hereby demands that you preserve all documents, tangible things, and electronically stored information potentially relevant to the issues in this matter. As used in this document, “You” and “Your” refers to David Arnold and D.E. Web Works, LLC, and its predecessors, successors, parents, subsidiaries, divisions or affiliates, and their respective officers, board members, directors, agents, attorneys, accountants, employees, partners, or other persons occupying similar positions or performing similar functions. You are legally obligated to preserve relevant documents and data. This information must be preserved until the matter is resolved. You must also suspend deletion, overwriting, or any other possible destruction of relevant documents and data until further notice. Failure to do so could result in substantial penalties against You.

Specifically, my firm requests that You preserve documents including but not limited to the following:

All documents and data in Your possession or control, including but not limited to reports, correspondence including email communications, memorandum, photographs, including all videos, and telephonic records, all documents involving Frank Thomas Shumate; Cinch Wireline Services, LLC; Cinch Energy Services, LLC; Cinch Investment Holdings, LLC; Hook N Bull Properties, LLC; Los Cabos Ranch, LLC; WFO Homes, LLC; Texas Coast Builders, LLC; 17 Main, LLC; Grander Holdings, LLC; WFO, LLC; Ponder Ranch, LLC; BL Equity Holdings, LLC; Ocean Floor Holdings, LLC; Mark Lopez; Loretta L. Higgins; Timothy Gaines Pollard; Jerry Miller.

"Documents and Data" includes not only hard copy files such as memos, correspondence, faxes, spreadsheets, PowerPoint presentations, reports, handwritten notes, drafts, billing records, invoices, calendars, appointment books, notebooks, binders but also electronically stored information ("ESI"). ESI includes, without limitation, email, and other files such as calendars and contacts; instant messages; computer files such as word processing documents, spreadsheets, schedules, financial records, and databases; Internet usage files; audio recordings; voicemail; iMessage/MMS/SMS text messages; videos; photographs and all other electronic information created, received and maintained on Your computer systems.

ESI may be located on servers, computer hard drives, removable media (e.g., flash drives, CDs, and DVDs), laptop computers, smartphones, and other locations where electronic data is stored, including Cloud-based file syncing and sharing services, and file hosting services. Please keep in mind that these sources may include personal computers You use or have access to at home or other locations. It also includes inaccessible storage media, such as backup files, which may contain relevant electronic information that does not exist in any other form. ESI must be preserved regardless of whether hard copies of the data exist.

Documents relating to this matter should not be removed from their current files/folders; and files/folders containing those documents should be maintained as they currently exist. It is acceptable to segregate those files/folders from Your other files/folders if the files/folders containing the relevant documents remain intact. If You doubt whether to retain any document or data, You must preserve and retain the document.

This list is not exhaustive; all documents and data relating in any way to this matter must be preserved.

Please disseminate this letter to Your colleagues, employees, and others who also would have knowledge and information regarding this matter and those who have control over Your files, including ESI.

Please direct all future communication to me regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Butch Boyd', written in a cursive style.

Butch Boyd

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